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Attorney for Defendant  
ARNES KRAJINIC

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,  
v.

ARNES KRAJINIC,

Defendant.

Case No.: 2:23-CR-00074-DJC

AMENDED STIPULATION  
REGARDING EXCLUDABLE TIME  
PERIODS UNDER SPEEDY TRIAL  
ACT; FINDINGS AND ORDER

DATE: January 4, 2024

TIME: 9:00 a.m.

COURT: Hon. Daniel J. Calabretta

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and  
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on November 30,  
2023.

2. By this stipulation, the parties move to continue the status conference until  
January 4, 2024, and to exclude time through January 4, 2024, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case  
includes search warrants, photographs, audio recordings, and video recordings. This

STIPULATION REGARDING EXCLUDABLE TIME  
PERIODS UNDER SPEEDY TRIAL ACT

1 discovery has been either produced directly to counsel and/or made available for  
2 inspection and copying.

3 b) Counsel for defendant desires additional time to consult with his client  
4 regarding discovery and otherwise prepare for trial.

5 c) Counsel for defendant believes that failure to grant the above-requested  
6 continuance would deny him the reasonable time necessary for effective preparation,  
7 taking into account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by continuing the  
10 case as requested outweigh the interest of the public and the defendant in a trial within  
11 the original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §  
13 3161, et seq., within which trial must commence, the time period of November 30, 2023,  
14 to January 4, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. §  
15 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by  
16 the Court at defendant's request on the basis of the Court's finding that the ends of justice  
17 served by taking such action outweigh the best interest of the public and the defendant in  
18 a speedy trial.

19 4. Nothing in this stipulation and order shall preclude a finding that other  
20 provisions of the Speedy Trial Act dictate that additional time periods are excludable  
21 from the period within which a trial must commence.

22 **IT IS SO STIPULATED.**

23 Dated: November 28, 2023

/s/ David D. Fischer

DAVID D. FISCHER

Attorney for Defendant

ARNES KRAJINIC

PHILLIP A. TALBERT  
US ATTORNEY

Dated: November 28, 2023

/s/ Alexis Klein  
ALEXIS KLEIN  
Assistant United States Attorney

**ORDER**

IT IS SO FOUND AND ORDERED this 28th day of November, 2023.

/s/ Daniel J. Calabretta

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THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE